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BEFORE THE ARIZONA CORPORATION

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COMMISSIONERS

GARY PIERCE, CHAIRMAN

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JUN -8 P 4:44

AZ CORP. COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

JUN 8 2011

DOCKETED BY

LYNNELL LEVINGSTON,

Complainant/Plaintiff,

vs.

NAVOPACHE ELECTRIC
COOPERATIVE, INC.,

Respondents/Defendants.


DOCKET NO. E-01787A-11-0197

NAVOPACHE ELECTRIC COOPERATIVE,
INC.'S MOTION TO EXTEND TIME TO FILE
RESPONSIVE PLEADING

Navopache Electric Cooperative, Inc. ("NEC"), by and through undersigned counsel, hereby requests a two week extension, until June 27, 2011, in which to file a responsive pleading in this matter. NEC Representatives needed to assist in preparing a response to the Complaint are otherwise occupied due to the massive Wallow Fire in northeast Arizona, a significant portion of which is within NEC's certificated territory. Legal counsel for Staff was contacted and does not object to the extension. A voice message for Ms. Levingston was left at the number indicated on her complaint on the afternoon of June 7, 2011 advising her of NEC's need for the extension and requesting a return call. No response has yet been received from Ms. Levingston.

1 DATED this 8th day of June, 2011.

2 CURTIS, GOODWIN, SULLIVAN,
3 UDALL & SCHWAB, P.L.C.

4 By: 
5 William P. Sullivan
6 501 East Thomas Road
7 Phoenix, Arizona 85012-3205
8 Attorneys for Navopache Electric
9 Cooperative, Inc.


10
11
12 PROOF OF AND CERTIFICATE OF MAILING

13
14 I hereby certify that on this 8th day of June, 2011, I caused the foregoing
15 document to be served on the Arizona Corporation Commission by delivering the original and
16 thirteen (13) copies of the above to:

17 Docket Control
18 Arizona Corporation Commission
19 1200 West Washington
20 Phoenix, Arizona 85007

21 COPY of the foregoing mailed
22 this 8th day of June, 2011 to:

23 Lynnell Levingston
24 417 S. Tumbling T Drive
25 Springerville, Arizona 85938


0109\016-0003-0033 adv Levingston\Mtn to Extend.doc